



Robert W. Quinn, Jr.
Federal Government Affairs
Vice President

Suite 1000
1120 20th Street NW
Washington DC 20036
202 457 3851
FAX 202 457 2545

November 19, 2001

Via Electronic Filing
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Presentation:
CC Docket No. 96-128, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Ms. Salas:

On Friday November 16, 2001, Rich Rubin and I had a telephone conversation with Linda Kinney, Associate General Counsel to the Commission, to discuss issues raised in the aforementioned proceeding. During the course of that conversation, we explained AT&T's position that the Commission should stay the new payphone compensation rules currently scheduled to go into effect November 26, 2001 in order to set a factor that would be applied to all payphone calls handed off by facilities-based carriers to platform providers for purposes of payphone compensation. We explained that under the rules scheduled to go into effect, AT&T would have to assess on 100% of the traffic sent to platform providers because we do not possess the data that would enable AT&T to determine whether the call sent to that provider was "completed" consistent with the Commission's rules. We also emphasized if the Commission did not address this issue, it is practically certain that the rules scheduled to go into effect would result in IXCs being dragged into litigation by both platform providers and payphone providers over the level of compensation the platform providers ultimately should pay to payphone providers. We urged the Commission to act.

Our statements were consistent with the positions previously articulated by AT&T in filings in the above referenced proceedings. I have submitted two copies of this Notice in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Quinn, Jr." with a stylized flourish at the end.

Robert W. Quinn, Jr.

cc: L. Kinney
K. Dixon